

**EPA**United States Environmental Protection Agency  
Washington, DC 20460**Notification of Hazardous Waste Activity**

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

C  
C  
N

Installation's EPA ID Number

Approved

Date Received  
(yr. mo. day)C  
F  
ILD0002036945  
T/A  
C  
1  
A  
900611  
COPY

## I. Name of Installation

C  
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## II. Installation Mailing Address

Street or P.O. Box

C  
3  
1950  
M  
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U  
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T  
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S  
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E  
T

City or Town

State

ZIP Code

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4

## III. Location of Installation

Street or Route Number

C  
5  
S  
A  
M  
E  
A  
S  
A  
B  
O  
V  
E

City or Town

State

ZIP Code

C  
6

## IV. Installation Contact

Name and Title (last, first, and job title)

Phone Number  
(area code and number)C  
2  
G  
O  
L  
D  
B  
E  
R  
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8  
5  
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8  
4  
7  
0  
0

## V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership  
(enter code)C  
R  
B  
A  
R  
B  
A  
R  
A  
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A  
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P

## VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions.)

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

☒ 1a. Generator ☐ 1b. Less than 1,000 kg/mo.☐ 2. Transporter☐ 3. Treater/Storer/Disposer☐ 4. Underground Injection☐ 5. Market or Burn Hazardous Waste Fuel

(enter 'X' and mark appropriate boxes below)

☐ a. Generator Marketing to Burner☐ b. Other Marketer☐ c. Burner☐ 6. Off-Specification Used Oil Fuel☐ a. Generator Marketing to Burner☐ b. Other Marketer☐ c. Burner☐ 7. Specification Used Oil Fuel Marketer (or On site Burner)  
Who First Claims the Oil Meets the Specification

RECEIVED

JUN - 1 1990

IEPA/DLPC

097 Lake

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler☐ B. Industrial Boiler☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only - enter 'X' in the appropriate box(es))

☐ A. Air☐ B. Rail☐ C. Highway☐ D. Water☐ E. Other (specify)

## IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☒ A. First Notification☐ B. Subsequent Notification  
(complete item C)

C. Installation's EPA ID Number





**To Whom It May Concern**

As of November-1995, Certified Packaging Corporation has acquired the assets of Complete Packaging Corporation through bankruptcy court.

Certified Packaging corporation is not responsible for any of Complete Packaging's liabilities, agreements or licenses.

Thank You,

A handwritten signature in black ink, appearing to read 'Irwin Morris', is written over a horizontal line.

Irwin Morris  
President





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

**DEC 10 2001**

DE-9J

**CERTIFIED MAIL: 7001 0320 0005 9027 8994**  
**RETURN RECEIPT REQUESTED**

Larry Pommier  
Vice President - Operations  
Certified Packaging Corporation  
1950 Marquette Street  
North Chicago, Illinois 60064

Re: Compliance Evaluation Inspection  
EPA I.D. No.: None

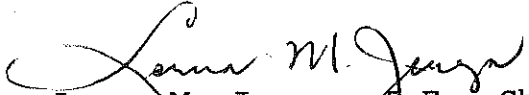
Dear Mr. Pommier:

On October 29, 2001 and November 12, 2001, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected Certified Packaging Corporation located in North Chicago, Illinois (the facility). The purpose of the inspection was to evaluate your facility's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA), specifically the Standards Applicable to Generators of Hazardous Waste set forth at 35 I.A.C. Part 722 [40 CFR Part 262]. Enclosed please find a copy of our inspection report dated November 20, 2001.

As of this writing, based upon information available to U.S. EPA, Certified Packaging Corporation is not a generator of hazardous waste and therefore not subject to RCRA regulatory requirements. This determination does not limit the applicability of regulations under other environmental statutes, or future applicability of the requirements evaluated and other RCRA regulations. U.S. EPA and the Illinois Environmental Protection Agency may evaluate your facility in the future.

If you have any questions or concerns regarding this matter,  
please contact Jena Sleboda, of my staff, at (312) 353-1263.

Sincerely,



Lorna M. Jereza, E.E., Chief  
Compliance Section 1  
Enforcement and Compliance Assurance Branch

Enclosure

cc: Frank Goldberg, FJG & Associates  
Todd Marvel, Illinois EPA



**RCRA COMPLIANCE EVALUATION INSPECTION REPORT  
U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 5**

**Purpose:** RCRA Compliance Evaluation  
Inspection

**Facility:** Certified Packaging Corp.  
No EPA ID number

**SIC Code:** 2819

**Date of Inspection:** October 29, 2001 (Site Visit)  
November 12, 2001 (Records Review)

**U.S. EPA Inspector:** Jena Sleboda  
Environmental Engineer  
(312) 353-1263  
Sleboda.Jena@epa.gov

**Facility Representatives:** Larry Pommier  
Vice President - Operations  
Office: (847) 625-1515  
Fax: (810) 958-5876

Frank Goldberg  
Consultant  
FJG & Associates  
Office: (847) 949-4225  
Fax: (847) 949-4290

**Report Prepared By:** Jena M. Sleboda

**Date:** November 20, 2001

## INTRODUCTION

The U.S. Environmental Protection Agency (EPA) conducted a RCRA Compliance Evaluation Inspection (CEI) at Certified Packaging Corporation (CPC) in North Chicago, Illinois. A site inspection was performed on October 29, 2001 and a review of paperwork was conducted on November 12, 2001. The records review was conducted on a different date due to a vacation taken by CPC's regulations consultant, Frank Goldberg. No inspectors from the Illinois Environmental Protection Agency (IEPA) were present on either date. On October 24 and 25, 2001, I contacted Mr. Goldberg regarding the inspection, and made arrangements to visit the facility.

At the site inspection, I met with Larry Pommier, the facility manager. Mr. Pommier described the products of the facility, including gel air fresheners, deodorant, and baby oil gel. He also stated that they do not generate any hazardous waste. The facility does generate used oil, approximately two 55-gallon drums a year from machine maintenance. All solid wastes are accepted by a landfill, and the facility is currently working with the North Shore Sanitary District on a water discharge analysis. Mr. Pommier also informed me that they were diking various areas of the plant along with other renovations due to a building inspection by the City of North Chicago. Furthermore, Mr. Pommier stated that CPC is not the same company as Chemical Packaging Corp. that obtained an EPA ID number and sent in a Hazardous Waste Notification form. Therefore CPC does not have an EPA ID number.

During the November 12, 2001 records review, I met with Frank Goldberg at the facility. There he informed me that the company does not have any hazardous waste analysis, and that all their waste is non-hazardous as known by process knowledge. All waste except used oil is thrown in the dumpster. The facility has recently been approved to discharge 6,000-7,000 gallons of filtered wastewater from tank washings to the North Shore Sanitary district. This wastewater has been accumulating for approximately eighteen months. Currently, the only waste that is discharged to the sewers is from the restrooms on site, all other drains were sealed years back.

Mr. Goldberg informed me that the following companies had occupied the site at 1950 Marquette Street in this order: Hercules Powder (dynamite) in the 1920s, DuPont, U.S. Steel,



Reliance Paint, Cadillac Packaging, Chemical Packaging, Complete Packaging (went into bankruptcy in 1995), and currently Certified Packaging Corp., which acquired the assets of Complete Packaging. Mr. Goldberg also stated that Chemical Packaging had many Underground Storage Tanks (USTs) removed when they occupied the site, and the removal was monitored by the Illinois EPA and U.S. EPA. CPC has not done any soil testing on the site. CPC leases the facility from Tasner Real Estate.

Mr. Goldberg also stated that the only hazardous chemical that is at the facility is STA alcohol, which is a feedstock for gel air fresheners. CPC also has some ORMD shipping for its products. CPC has done a TRI evaluation, but they have not sent TRI reports in for the last years because they are under the limits for reporting.

#### FACILITY OPERATION, PROCESSES, AND PRODUCTS

The facility is a packaging plant that packages a variety of gel-like products for various companies. Some examples of the products are deodorant, gel air fresheners, and gel baby oil. The company's production rate varies, and therefore so does its number of employees.

#### FACILITY INSPECTION

I first looked at the records that were on hand at the facility. These were the employee safety training and the emergency plan. The training records were complete and the emergency plan complied with the requirements for Small Quantity Generators. Since there is no hazardous waste generated at this site, they did not have a list of employees who handled hazardous waste.

Mr. Pommier then led me on a tour of the facility. The facility has two floors of process areas. In these areas there are process pipes and then a tank which holds the final product without packaging. The final product is then fed from that tank into the packaging container. The sizes of the tanks depended on the process. CPC will be diking around the tanks in the deodorant production area, the Renuzit gel area,, in response to the City of North Chicago's inspection. There are two very large tanks in the downstairs (basement) area that will also be diked.

There were some very large tanks that are no longer in use, and these will be removed from the facility. These tanks were

located in the deodorant final area and the downstairs area. Two other large tanks will be moved, diked, and used for feedstock storage. CPC will also be diking additional areas downstairs to surround their feedstock materials. These areas currently hold feedstock storage, but it will be reorganized after the diking takes place.

Mr. Pommier then showed me where the used oil was stored. It was in a basement area in a shed-like storage area. There were two approximately 55-gallon oil drums on a platform. Both drums were labeled with the words "Used Oil." One of the drums was a little bent on the top. An employee stated the drum had been dropped before the oil had been put in so the drum was warped, and was not about to explode.

The only document I looked at during the November 12 records review is a letter stating that Certified Packaging is not the same company as Chemical Packaging. I had asked about this due to Chemical Packaging having an EPA ID number and CPC not having an EPA ID number. All other records that were relevant had been looked at during the previous site visit.

#### RCRA INSPECTION FINDINGS

1. One of the two drums of used oil had been dropped before the used oil was placed in it. Used oil drums should be in better condition to ensure the integrity of the drum is not compromised.



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Vice President - Operations  
Certified Packaging Corporation  
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North Chicago, Illinois 60064

**AUTHOR**

Re: Compliance Evaluation Inspection  
EPA I.D. No.: None

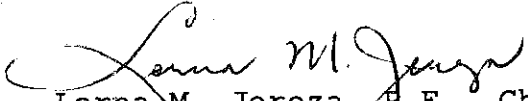
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If you have any questions or concerns regarding this matter, please contact Jena Sleboda, of my staff, at (312) 353-1263.

Sincerely,

A handwritten signature in cursive script, reading "Lorna M. Jereza".

Lorna M. Jereza, E.E., Chief  
Compliance Section 1  
Enforcement and Compliance Assurance Branch

Enclosure

cc: Frank Goldberg, FJG & Associates  
Todd Marvel, Illinois EPA

**RCRA COMPLIANCE EVALUATION INSPECTION REPORT  
U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 5**

**Purpose:** RCRA Compliance Evaluation  
Inspection

**Facility:** Certified Packaging Corp.  
No EPA ID number

**SIC Code:** 2819

**Date of Inspection:** October 29, 2001 (Site Visit)  
November 12, 2001 (Records Review)

**U.S. EPA Inspector:** Jena Sleboda  
Environmental Engineer  
(312) 353-1263  
Sleboda.Jena@epa.gov

**Facility Representatives:** Larry Pommier  
Vice President - Operations  
Office: (847) 625-1515  
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Frank Goldberg  
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**Report Prepared By:** Jena M. Sleboda

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#### FACILITY OPERATION, PROCESSES, AND PRODUCTS

The facility is a packaging plant that packages a variety of gel-like products for various companies. Some examples of the products are deodorant, gel air fresheners, and gel baby oil. The company's production rate varies, and therefore so does its number of employees.

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#### RCRA INSPECTION FINDINGS

1. One of the two drums of used oil had been dropped before the used oil was placed in it. Used oil drums should be in better condition to ensure the integrity of the drum is not compromised.



**Sue Brauer**

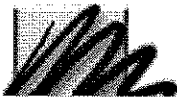
11/19/2001 12:59 PM

To: Jena Sleboda/R5/USEPA/US@EPA  
cc:  
Subject: Re: City of North Chicago Complaint

Jena,

Thank you for following up on the complaint I forwarded. No, I don't need a copy of the checklist. Used oil generators are not required to notify for only used oil generator activities.

Sue Brauer  
Jena Sleboda



**Jena Sleboda**

11/19/01 10:55 AM

To: Sue Brauer/R5/USEPA/US@EPA  
cc:  
Subject: Re: City of North Chicago Complaint

Sue,

After inspecting the facility, I found that the facility does not generate any hazardous waste. However, they did have two drums of used oil on site that they were in the process of getting rid of (everything looked fine except one drum was a little out of shape, they said they dropped it before they put the oil in it). I have the checklist if you would like a copy. Do you know if the facility needs to obtain an EPA ID# if they only generate used oil (~2 drums/year)?

Thanks,  
Jena



**RCRA COMPLIANCE EVALUATION INSPECTION REPORT  
U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 5**

**Purpose:** RCRA Compliance Evaluation  
Inspection

**Facility:** Certified Packaging Corp.  
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#### **RCRA INSPECTION FINDINGS**

1. The facility needs a RCRA ID #?
2. One of the two drums of used oil had been dropped. This does not meet the definition of "good condition."

#### **ATTACHMENTS**



Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	<b>Part 739: Standards for the Management of Used Oil</b> <b>Subpart B: Applicability</b> <b>Note:</b> Used oil not exceeding any specification level of Section 739.111 is subject only to Sections 739.172, 739.173 and 739.174(b). <b>Section 739.112: Prohibitions</b>	
739.112(a)	a) Is used oil being managed only in a surface impoundment or waste pile that is regulated under Parts 724 or 725? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.112(a)
739.112(b)	b) Is used oil being used as a dust suppressant? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.112(b)
739.112(c)	c) Is off-spec oil fuel burned for energy recovery in only industrial furnaces identified in Section 720.111, utility boilers, or used oil fired space heaters that meet the provisions of Section 739.123? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.112(c)
	<b>Subpart C: Standards for Used Oil Generators</b> <b>Section 739.121: Hazardous Waste Mixing</b>	
739.121(a)	Is the generator mixing hazardous waste with used oil only as provided in Section 739.110(b)(2)(B) and (C)? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.121(a)
739.121(b)	If "Yes", is the generator of a used oil containing greater than 1000 ppm total halogens managing the used oil as a hazardous waste unless the presumption is rebutted (i.e. analytical data is available)? Yes _____ No _____ N/A _____	739.121(b)
	<b>Section 739.122: Used Oil Storage</b>	
739.122(a)	Does the generator only store used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes <input checked="" type="checkbox"/> No _____ N/A _____	739.122(a)
739.122(b)	Are containers and aboveground tanks used by a generator (to store used oil) in good condition with no visible leaks? <i>dropped</i> Yes <input checked="" type="checkbox"/> No _____ N/A _____	739.122(b)
739.122(c)	Are containers, aboveground tanks, and fill pipes used for underground tanks labelled or marked "Used Oil"? Yes <input checked="" type="checkbox"/> No _____ N/A _____	739.122(c)
739.122(d)	Has the generator, upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes _____ No <input checked="" type="checkbox"/> N/A _____	739.122(d)
	<b>Section 739.123: On-Site Burning in Space Heaters</b>	
739.123(a)	Is the generator burning used oil in used oil fired space heaters only when: 1) the heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourselfers (DIY) generators; and 2) the heater is designed to have a maximum capacity of not more than 0.5 million Btu per hour; and 3) the combustion gases from the heater are vented to the ambient air? Yes _____ No _____ N/A _____	739.123(a)
	<b>Section 739.124: Off-Site Shipments</b>	
739.124	Has the generator ensured that the used oil is hauled only by transporters that have obtained a USEPA ID # and an IEPA special waste ID # pursuant to Part 809, unless the generator qualifies for an exemption pursuant to Part 739 (self transportation to aggregate points owned by the generator or tolling agreements)? <i>looking for contractor right now</i> Yes _____ No _____ N/A _____ (Used Oil - 1)	739.124





Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	<b>Subpart D: Standards for Used Oil Collection Centers</b>	
	<b>Section 739.130: Do-It-Yourselfer (DIY) Used Oil Collection Centers</b>	
739.130(b)	Does the DIY collection center comply with the generator standards in Subpart C of Part 739? Yes _____ No _____ N/A _____	739.130(b)
	<b>Section 739.131: Used Oil Collection Centers</b>	
739.131(b)	Is the used oil collection center in compliance with the generator standards in Subpart C of Part 739 and registered by the Agency to manage used oil? Yes _____ No _____ N/A _____	739.131(b)
	<b>Section 739.132: Used Oil Aggregation Points Owned by the Generator</b>	
739.132(b)	Does the owner/operator of a used oil aggregation point comply with all standards in Subpart C of Part 739? Yes _____ No _____ N/A _____	739.132(b)
	<b>Subpart E: Standards for Used Oil Transporter and Transfer Facilities</b>	
	<b>Section 739.141: Restrictions on transporters who are not also processors</b>	
739.141(a)	Has the used oil transporter who processes used oil complied with the requirements for processors in Subpart F [except as provided in subsection 739.141(b)]? Yes _____ No _____ N/A _____	739.141(a)
	<b>Note:</b> Used oil transporters may consolidate or aggregate loads of used oil for purposes of transportation.	
739.141(b)	Has the transporter who conducts incidental processing operations that occur in the normal course of transportation (e.g. settling and water separation), but that are not designed to produce (or make more amenable for production of) used oil derived products, complied with the processor requirements in Subpart F? Yes _____ No _____ N/A _____	739.141(b)
	<b>Section 739.142: Notification</b>	
739.142(a)	Has the used oil transporter complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.142(a)
	<b>Section 739.143: Used Oil Transportation</b>	
739.143(a)	Has the used oil transporter delivered all used oil to: 1) another used oil transporter that has a USEPA ID # and an IEPA special waste ID #; or 2) a used oil processing facility that has a USEPA ID # and an IEPA special waste ID #; or 3) an off-spec used oil burning facility that has a USEPA ID # and an IEPA special waste ID #; or 4) an on-spec used oil burning facility? Yes _____ No _____ N/A _____	739.143(a)
739.143(b)	Has the used oil transporter complied with all applicable packaging and labelling, as well as applicable hazardous material regulations of the USDOT regulations of 49 CFR Parts 171 through 180? Yes _____ No _____ N/A _____	739.143(b)
739.143(c)	Has the used oil transporter who has a discharge of used oil taken appropriate actions as outlined in Part 739? Yes _____ No _____ N/A _____	739.143(c)
	<b>Section 739.144: Rebuttable Presumption</b>	
739.144(a)	Has the used oil transporter determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? Yes _____ No _____ N/A _____	739.144(a)
739.144(d)	Has the used oil transporter retained all records of analysis and information used to comply with this Section for at least 3 years? Yes _____ No _____ N/A _____	739.144(d)
	(Used Oil - 2)	





Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.145	<b>Section 739.145: Used Oil Storage at Transfer Stations</b> Has the owner/operator of a used oil transfer facility: b) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes _____ No _____ N/A _____ c) only stored used oil in containers and aboveground tanks that are in good condition, with no visible leaks? Yes _____ No _____ N/A _____ d) provided for secondary containment for containers as required by this Subsection? Yes _____ No _____ N/A _____ e) provided for secondary containment for existing aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____ f) provided for secondary containment for new aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____ g) labelled all containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? Yes _____ No _____ N/A _____ h) upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other material; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes _____ No _____ N/A _____	739.145
739.146(a)	<b>Section 739.146: Tracking</b> Has the used oil transporter kept a record of each used oil shipment that includes: 1) the name and address of the generator, transporter, or processor (GTP) who provided the used oil for transport; and 2) the USEPA ID # and IEPA special waste ID # of the GTP that provided the used oil; and 3) the quantity of used oil accepted; and 4) the date accepted; and 5) the signature of a representative of the GTP that provided the used oil? Yes _____ No _____ N/A _____	739.146(a)
739.146(b)	Has the used oil transporter kept a record of each shipment of used oil that is delivered to another used oil transporter, burner, processor, or disposal facility that includes: 1) the name and address of the receiving facility or transporter; and 2) the USEPA ID # and IEPA special waste ID # of the receiving facility or transporter; and 3) the quantity of used oil delivered; and 4) the date of delivery; and 5) the signature of a representative of the receiving facility or transporter? Yes _____ No _____ N/A _____	739.146(b)
739.146(c)	Has the used oil transporter who exports used oil to a foreign country complied with this subsection? Yes _____ No _____ N/A _____	739.146(c)
739.146(d)	Has the used oil transporter retained all records required under this Section for at least 3 years? Yes _____ No _____ N/A _____	739.146(d)
739.147	<b>Section 739.147: Management of Residues</b> Does the used oil transporter who generates residues from the storage or transportation of used oil manage the residues as specified in Section 739.110? Yes _____ No _____ N/A _____	739.147



Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	<b>Subpart F: Standards for Used Oil Processors</b>	
739.151	<b>Section 739.151: Notification</b> Has the used oil processor obtained a USEPA ID# and an IEPA special waste ID#? Yes _____ No _____ N/A _____	739.151
739.152(a)	<b>Section 739.152: General Facility Standards</b> Has the owner/operator of a used oil processor and refiner: <ol style="list-style-type: none"> <li>1) maintained and operated the facility to minimize the possibility of fire, explosion, or release of used oil; and</li> <li>2) ensured that he is equipped with the equipment required in this Subsection; and</li> <li>3) tested and maintained equipment as required; and</li> <li>4) maintained access to communication or alarm system(s); and</li> <li>5) maintained the required aisle space; and</li> <li>6) maintained arrangements with local authorities?</li> </ol> Yes _____ No _____ N/A _____	739.152(a)
739.152(b)	Has the owner/operator of a used oil processing and refining facility complied with the following requirements: <ol style="list-style-type: none"> <li>1) developed a contingency plan; and</li> <li>2) ensured that the contingency plan complies with the requirements of this Section; and</li> <li>3) maintained and submitted to all local authorities copies of the contingency plan and all revisions; and</li> <li>4) amended the contingency plan as applicable to this Subsection; and</li> <li>5) ensured that an emergency coordinator is on the premises or on call at all times to meet the requirements of this Subsection; and</li> <li>6) ensured that emergency procedures meet the requirements of this Subsection?</li> </ol> Yes _____ No _____ N/A _____	739.152(b)
739.153	<b>Section 739.153: Rebuttable Presumption</b> Has the used oil processor determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? Yes _____ No _____ N/A _____	739.153
739.154(a)	<b>Section 739.154: Used Oil Management</b> Has the owner/operator of a used oil processor: <ol style="list-style-type: none"> <li>a) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725?                Yes _____ No _____ N/A _____</li> </ol>	739.154(a)
739.154(b)	<ol style="list-style-type: none"> <li>b) stored used oil at a transfer facility only in containers and aboveground tanks that are in good condition with no visible leaks?                Yes _____ No _____ N/A _____</li> </ol>	739.154(b)
739.154(c)	<ol style="list-style-type: none"> <li>c) provided secondary containment for containers as required by this Subsection?                Yes _____ No _____ N/A _____</li> </ol>	739.154(c)
739.154(d)	<ol style="list-style-type: none"> <li>d) provided secondary containment for existing aboveground tanks as required by this Subsection?                Yes _____ No _____ N/A _____</li> </ol>	739.154(d)
739.154(e)	<ol style="list-style-type: none"> <li>e) provided secondary containment for new aboveground tanks as required by this Subsection?                Yes _____ No _____ N/A _____</li> </ol>	739.154(e)
739.154(f)	<ol style="list-style-type: none"> <li>f) labelled or marked containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"?                Yes _____ No _____ N/A _____</li> </ol>	739.154(f)
739.154(g)	<ol style="list-style-type: none"> <li>g) done the following upon detection of a release of used oil:               <ol style="list-style-type: none"> <li>1) stopped the release; and</li> <li>2) contained the release; and</li> <li>3) cleaned up and managed the used oil and other materials; and</li> <li>4) repaired or replaced the containers or tanks prior to returning them to service, if necessary?</li> </ol>               Yes _____ No _____ N/A _____             </li> </ol>	739.154(g)



Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.154(h)	h) closed aboveground tanks and containers in accordance with this Section? Yes _____ No _____ N/A _____	
739.155	<b>Section 739.155: Analysis Plan</b> Has the owner/operator of a used oil processing and re-refining facility developed, kept on-site, and followed a written waste analysis plan describing the procedures that will be used to comply with the rebuttable presumption and on-spec Sections of this Part? Yes _____ No _____ N/A _____	739.154(h)  739.155
739.156	<b>Section 739.156: Tracking</b> Has the used oil processor kept a record of each used oil shipment accepted for processing (i.e. invoice, manifest, bill of lading, or other) that includes: 1) the name and address of the transporter who delivered the used oil to the processor; and 2) the name and address of the generator or processor from whom the used oil was sent for processing; and 3) the IEPA special waste ID # of the transporter who delivered the used oil to the processor; and 4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent for processing; and 5) the quantity of used oil shipped; and 6) the date of shipment? Yes _____ No _____ N/A _____	739.156
739.156(b)	Has the used oil processor kept a record of each shipment of used oil that is delivered to a burner, processor, or disposal facility that includes: 1) the name and address of the transporter who delivers the used oil to the burner, processor or disposal facility; and 2) the name and address of the burner, processor, or disposal facility who will receive the used oil; and 3) the IEPA special waste ID # of the transporter who delivers the used oil to the burner, processor, or disposal facility; and 4) the IEPA special waste ID # of the burner, processor, or disposal facility who will receive the used oil; and 5) the quantity of used oil shipped; and 6) the date of shipment? Yes _____ No _____ N/A _____	739.156(b)
739.156(c)	Have the records described in this Section been maintained for at least 3 years? Yes _____ No _____ N/A _____	739.156(c)
739.157(a)	<b>Section 739.157: Operating Record and Reporting</b> Has the owner/operator kept a written operating record at the facility that contains the following: - records and results of oil analyses performed as described in the analysis plan required under Section 739.155? Yes _____ No _____ N/A _____ - summary reports and details of all incidents that require implementation of the contingency plan as specified in Section 739.152(b)? Yes _____ No _____ N/A _____	739.157(a)
739.157(b)	Has the used oil processor reported to the Agency in the form of a letter, on a biennial basis by March 1, the following information: 1) the IEPA special waste ID #, name and address of the processor; and 2) the calendar year covered by the report; and 3) the quantities of used oil accepted for processing and the manner in which the used oil is processed, including the specific processes employed; and 4) the USEPA ID #? Yes _____ No _____ N/A _____	739.157(b)





Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.158	<b>Section 739.158: Off-Site Shipments of Used Oil</b> Has the used oil processor who initiates a shipment of used oil off-site used a used oil transporter that has a USEPA ID # and an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.158
739.159	<b>Section 739.159: Management of Residue</b> Does the used oil processor who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? Yes _____ No _____ N/A _____	739.159
	<b>Subpart G: Standards for Used Oil Burners Who Burn Off-Spec Used Oil for Energy Recovery</b>	
739.161	<b>Section 739.161: Restriction on Burning</b> Is off-spec oil fuel burned for energy recovery only in industrial furnaces identified in Section 720.111, utility boilers, used oil fired space heaters that meet the provisions of Section 739.123, or hazardous waste incinerators? Yes _____ No _____ N/A _____	739.161
739.162	<b>Section 739.162: Notification</b> Has the used oil burner complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.162
739.163(a)	<b>Section 739.163: Rebuttable Presumption for Used Oil</b> Has the used oil burner determined whether the total halogen content of the used oil being transported or stored at a transfer facility is above or below 1000 ppm? Yes _____ No _____ N/A _____	739.163(a)
739.163(d)	Has the used oil burner retained all records of analyses and information used to comply with this Section for at least 3 years? Yes _____ No _____ N/A _____	739.163(d)
	<b>Section 739.164: Used Oil Storage</b> Has the owner/operator of a used oil burning facility:	
739.164(a)	a) only stored used oil in tanks, containers, or units subject to regulation under Parts 724 or 725? Yes _____ No _____ N/A _____	739.164(a)
739.164(b)	b) used only containers and aboveground tanks that are in good condition, with no visible leaks, to store used oil? Yes _____ No _____ N/A _____	739.164(b)
739.164(c)	c) provided secondary containment for containers as required by this Subsection? Yes _____ No _____ N/A _____	739.164(c)
739.164(d)	d) provided secondary containment for existing aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____	739.164(d)
739.164(e)	e) provided secondary containment for new aboveground tanks as required by this Subsection? Yes _____ No _____ N/A _____	739.164(e)
739.164(f)	f) labelled or marked all containers, aboveground tanks, and fill pipes used for underground tanks with the words "Used Oil"? Yes _____ No _____ N/A _____	739.164(f)
739.164(g)	g) upon detection of a release of used oil, done the following: 1) stopped the release; and 2) contained the release; and 3) cleaned up and managed the used oil and other materials; and 4) repaired or replaced the containers or tanks prior to returning them to service, if necessary? Yes _____ No _____ N/A _____	739.164(g)
	(Used Oil - 6)	



Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
739.165(a)	<b>Section 739.165: Tracking</b> Has the used oil burner kept a record of each used oil shipment accepted for burning (i.e. log, invoice, manifest, bill of lading or other) that includes: <ol style="list-style-type: none"> <li>1) the name and address of the transporter who delivered the used oil to the burner; and</li> <li>2) the name and address of the generator or processor from whom the used oil was sent to the burner; and</li> <li>3) the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and</li> <li>4) the IEPA special waste ID #, if applicable, of the generator or processor from whom the used oil was sent to the burner; and</li> <li>5) the quantity of used oil accepted; and</li> <li>6) the date of acceptance?</li> </ol>	739.165(a)
739.165(b)	Have the records described in this Section been maintained on-site for at least 3 years? Yes _____ No _____ N/A _____	739.165(b)
739.166(a)	<b>Section 739.166: Notice</b> Prior to accepting the first shipment of off-spec used oil fuel, has the used oil burner provided to the GTP a one-time written and signed notice certifying that: <ol style="list-style-type: none"> <li>1) the burner has notified the Agency stating the location and general description of the used oil management activities; and</li> <li>2) the burner will burn used oil only in an industrial furnace or boiler identified in Section 739.161(a)?</li> </ol>	739.166(a)
739.166(b)	Has the certification been maintained for at least 3 years from the date the burner last received a shipment of used oil from the GTP? Yes _____ No _____ N/A _____	739.166(b)
739.167	<b>Section 739.167: Management of Residue</b> Does the used oil burner who generates residues from the storage, processing, or re-refining of used oil manage the residues as specified in Section 739.110(e)? Yes _____ No _____ N/A _____	739.167
<b>Subpart H: Standards for Used Oil Fuel Marketers</b>		
739.171	<b>Section 739.171: Prohibitions</b> Has the used oil fuel marketer initiated a shipment of off-spec used oil only to a used oil burner that has a USEPA ID # and an IEPA special waste ID # and burns the used oil in an industrial furnace or boiler as specified in Section 739.161(a)? Yes _____ No _____ N/A _____	739.171
739.172(b)	<b>Section 739.172: On-Spec Used Oil Fuel</b> Has the GTP or burner who claims that the used oil meets the specification for used oil fuel under this Part, kept copies of analyses or other information for at least 3 years? Yes _____ No _____ N/A _____	739.172(b)
739.173(a)	<b>Section 739.173: Notification</b> Has the used oil marketer complied with the notification requirements of RCRA Section 3010 and obtained an IEPA special waste ID #? Yes _____ No _____ N/A _____	739.173(a)
739.174(a)	<b>Section 739.174: Tracking</b> Has the used oil generator kept a record of each used oil shipment accepted for burning (i.e. log, invoice, manifest, bill of lading, or other) that includes: <ol style="list-style-type: none"> <li>1) the name and address of the transporter who delivered the used oil to the burner; and</li> <li>2) the name and address of the burner who will receive the used oil; and</li> <li>3) the IEPA special waste ID # of the transporter who delivered the used oil to the burner; and</li> <li>4) the IEPA special waste ID # of the burner; and</li> </ol>	739.174(a)



Regulation	RCRA USED OIL INSPECTION CHECKLIST (PART 739)	Violation
	5) the quantity of used oil shipped; and 6) the date of acceptance?  <div style="text-align: right;">Yes _____ No _____ N/A _____</div>	
739.174(b)	Has the GTP or burner who claims that the used oil meets the fuel specification under Section 739.111 kept a record of each shipment of used oil to an on-spec used oil burner that includes the following: 1) the name and address of the facility receiving the shipment; and 2) the quantity of used oil fuel delivered; and 3) the date of shipment or delivery; and 4) a cross-reference to the record of used oil analyses or other information used to make the determination that the oil meets the specifications as required under Section 739.172(a)?  <div style="text-align: right;">Yes _____ No _____ N/A _____</div>	739.174(b)
739.174(c)	Have the records described in this Section been maintained on-site for at least 3 years?  <div style="text-align: right;">Yes _____ No _____ N/A _____</div>	739.174(c)
739.175(a)	<b>Section 739.175: Notices</b> Before a used oil GTP directs the first shipment of off-spec used oil to a burner, has the generator obtained a one-time written and signed notice from the burner certifying that: 1) the burner has notified the Agency stating the location and general description of used oil management activities; and 2) the burner will burn the off-spec used oil only in an industrial furnace or boiler identified in Section 739.161(a)?  <div style="text-align: right;">Yes _____ No _____ N/A _____</div> <p>COMMENTS:</p>	739.175(a)

(Used Oil - 8)

